

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

Case No. 2:15-md-02641- DGC

*This Document Relates to:*

Plaintiff: Eulalio Bazan  
Case: 2:16-cv-02603-DGC

**MOTION FOR SUBSTITUTION OF PARTY PLAINTIFF**

Counsel, pursuant to Rule 25(a)(1) of the Federal Rules of Civil Procedure, hereby moves this Court for an order substituting Maria Corina Bazan, as personal representative of the estate of Eulalio Bazan for the named Plaintiff in this case. As grounds therefore, counsel states as follows:

1. That Eulalio Bazan filed a products liability action on August 2, 2016.
2. That on or about May 1, 2019, Eulalio Bazan passed away.
3. Eulalio Bazan passed away without a will/intestate.
4. That a Notice/Suggestion of Death was filed today.
5. That Maria Corina Bazan is the sole surviving spouse of Eulalio Bazan.
6. That pursuant to Fed. R. Civ. P. 25(a)(1), the Court may order substitution of the proper parties upon a motion by any party or by the representatives of the deceased party.
7. That a proposed amended short form complaint reflecting the requested substitution is attached hereto as **Exhibit 1**.

WHEREFORE, Maria Corina Bazan, as surviving wife and representative of the decedent Eulalio Bazan, respectfully requests this Court grant her motion for Substitution of

Party. A proposed order is attached hereto as **Exhibit 2**.

DATED: August 14, 2019

Respectfully submitted,

LIEFF, CABRASER, HEIMANN  
& BERNSTEIN, LLP

By: /s/ Wendy R. Fleishman

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14th Day of August, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System for filing and service to all parties/counsel registered to receive copies in this case.

By: /s/ Wendy R. Fleishman  
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